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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
IN THE SHERMAN DIVISION**

IN RE: §
§ **CASE NO.: 18-41997**
FEYSAL AYATI-GHAFFARI §
§ **CHAPTER 13**
Debtor §

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

21-DAY NEGATIVE NOTICE – LBR 9007(a):

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this Motion/Objection/Application unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading **WITHIN TWENTYONE (21) DAYS FROM THE DATE OF SERVICE** shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES attorney Weldon Reed Allmand, and Allmand Law Firm, LLC

(hereinafter referred to as Movant) and files this his Motion to Withdraw as Attorney of Record, and in support thereof would respectfully show the following:

1. Feysal Ayati-Ghaffari (hereinafter referred to as "Debtor" whether singular or plural) on September 4, 2018 filed a *pro se* voluntary petition under Chapter 13 of title 11 of the United States Code.

2. On or about October 5, 2018, Movant filed a notice of appearance as the attorney of record for the debtor. Movant and debtor entered into an agreement for legal services which clearly identifies the scope of the representation Movant undertook.

3. The Debtor has continued to file *pro se* pleadings since Movant accepted representation of the case, and thereby continues to represent himself contrary to the advice of counsel.

4. Debtor does not agree with Movant's legal advice and instead insists Movant make legal arguments that Movant cannot ethically make and are inconsistent with established law.

5. Further, on February 22, 2018, Movant advised the Debtor that Movant can no longer continue with representation and recommends that the Debtor seek new legal counsel or represent himself.

6. Debtor has been, and will continue to be, advised of all pending matters, hearings and deadlines presently known to Movant until such time as the Court authorizes the withdrawal of Movant.

WHEREFORE, PREMISES CONSIDERED, Movant prays that the Court allow Movant to withdraw as counsel of record for Debtor.

DATED: March 11, 2019

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Weldon Reed Allmand

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CERTIFICATE OF CONFERENCE

This is to certify that Movant conferred with Debtor in writing about the merits of this motion, and has been unable to ascertain if Debtor is opposed to the Motion to Withdraw.

/s/ Weldon Reed Allmand
Weldon Reed Allmand

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 11, 2019, a true and correct copy of the foregoing was served on all parties in interest listed below by either electronic service or service by fist class mail.

Notice will be electronically mailed to:

Paul W. Cervenka on behalf of Creditor Chase Records Center
paul.cervenka@bonialpc.com

Carey D. Ebert on behalf of Trustee Carey D. Ebert,
ECFch13plano@ch13plano.com

Carey D. Ebert,
ECFch13plano@ch13plano.com

Chandra Dianne Pryor on behalf of Creditor JPMorgan Chase Bank, National Association
chandra.pryor@bonialpc.com

US Trustee
USTPRegion06.TY.ECF@USDOJ.GOV

Timothy A. York on behalf of Creditor JPMorgan Chase Bank, National Association
tyork@qslwm.com, nchancellor@qslwm.com

Notice will be sent by first class mail to:

DEBTOR:

Feysal Ayati-Ghaffari
2301 All Saints Lane
Plano, TX 75025

Exeter Finance LLC, c/o AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

PRA Receivables Management, LLC
PO Box 41021

By: /s/Weldon Reed Allmand
Weldon Reed Allmand
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